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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

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May 24,1991

Mr. Jerry Curtin
Remedial Project Officer
U.S. EPA, Region III
841 Chestnut Building
Philadelphia PA 19107

Re: Havertown PCP NPL Site, Haverford Township, Delaware County
Comments on Draft Feasibility Report
Groundwater/Sediments Operable Unit

Dear Jerry:

We have completed our review of the draft Feasibility Study report for the Havertown PCP site, and have the following comments upon it.

Overall, the copies of the Tetra Tech report sent were poorly constructed. Page 2-9 was missing, and therafter many pages were out of sequence, and printed so that it would be impossible to put them into the correct order. Pages 3-48 and 3-49 were inserted into the middle of section 4.

Many misspelled words, grammatical errors, and confusing phrases were encountered throughout the document. Some of these will be addressed below.

Pages 1-9 and 1-10: A wellhead map should be included near these pages, or referred to if elsewhere in the report.

Page 1-10, paragraph 3 should read "...56 gallons of oil were recovered...".

Page 1-18, paragraphs 4 and 5: Explain this relationship further. Did the total TPH in the groundwater also increase? Could the floating contaminants so largely dissolve in two years?

Page 1-24, paragraphs 3 and 4: "There was no PCP above quantitation limits in any of the sediment samples...","...The absence of PCP in the sediment...", but table 2-5 shows the concentrations of PCP found in the sediments.

Page 2-3, paragraph 3: "...sediments for sediment cleanup...". Does this mean ARARs?

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Tables 2-2, -23, and 2-4 do not indicate that the concentrations show for inorganics are in ppm. Are they really in ppb?

Table 2-1. The Pennsylvania cleanup level for groundwater is BACKGROUND, yet this table purports to show the Commonwealth's groundwater ARARs in a set of numbers. Where did these figures come from? Nothing listed in the references could contain Pennsylvania ARARs.

Page 2-4, paragraph 1: Does refer to Pennsylvania's ARAR for groundwater as background, directly in contradiction to Table 2-1.

Page 2-11, paragraph 5: Typographical error, "ells" should be wells.

Page 2-18, Granulated Activated Carbon Adsorbtion: This process could lead to the accumulation of drums of dioxin contaminated waste. These cannot be stored on site, and presently cannot be disposed of off site. What is the planned ultimate disposition of these drums?

Page 2-19, PACT System, same as above.

Pages 2-21 and 2-22, In Situ Bioremediation: While the local soils may preclude in situ treatment, nowhere is ex situ (i.e. containerized) bioremediation addressed. This process may be applicable to sediments, and to the soils which (while not the subject of this study) act as a 'sink' of contamination.

Page 2-22, line 3: Typo, "wold" should be would.

Page 2-23, section 2.4.2.2: While capping the NWP site may prevent surface runoff, it does nothing to mitigate the underlying problem, the contaminated soils. If site soil remediation is ever undertaken the cap would probably have to be removed.

Page 2-25, section 2.4.2.4: If Naylor's Run is to be piped, the sediments in the stream bed effectively become soils. Groundwater is likely to converge on the now below grade stream bed and follow the pipe down gradient. Any contamination in the soils could leach into this ground water, eventually to be discharged into the stream at the end of the pipe. Pennsylvania's ARAR for soils is that if leaching from the soils can lead to groundwater contamination, the soils must be remediated to background level. Perhaps further investigation or modelling could determine if this is likely to occur.

Page 2-26, section 2.4.3.2, On- Site Disposal: In effect proposes constructing a hazardous waste landfill in the middle of a suburban neighborhood. This is unlikely to meet with community approval.

Page 3-5, paragraph 5, line 5: eliminate "be".

Page 3-6: Changing the granulated carbon filters at the oil/water separator every week is totally impractical and infeasible. At approximately 700 pounds, a truck would have to drive through the homeowner's backyard to reach the separator. The drums could possibly be contaminated with dioxins and therefore not be disposable.

Page 3-8: Paragraph 2 states that the used carbon would probably contain dioxins, the following paragraph assumes that the spent carbon drums will be categorized as K001 waste (PCP related) and could be stored on site for disposal. These seem contradictory.

Page 3-13, paragraph 3: Typo, "Each pumps...".

Page 3-16, paragraph 3: Replace "possibility" with possibly, and "solids" with solid.

Pages 3-16 and 3-17, PACT System: No mention is made of the possible problems involved with the disposal of the sludge from this process.

Page 3-21, third line from bottom: Replace "a" with in.

Pages 3-21 and 3-36: Modeling should have/must be performed to determine the lenght of time involved with groundwater treatment.

Many paragraphs on pages 3-21/22 and 3-36/37 are identical. Entire sections on pages 3-40, 3-42, and 3-46 are also identical. If a statement is made once it can be recapitulated or referenced.

Page 3-48 is out of sequence.

Section 4.1: If "...it is not prudent to select a specific treatment system for the contaminated groundwater..." why continue section 4 as though a selected remedy had been chosen? If the selected groundwater alternative is to "...incorporate features of either Alternative GW-3 or GW-4, pending completion of treatability studies." that really isn't an alternative but a justification for further study before one is chosen.

Page 4-2: The chosen sediment alternative, piping a section of Naylor's Run, may not meet Pennsylvania's soil ARAR for reasons previously stated.

Page 4-4, section "Compliance with ARARs": We find this paragraph totally incomprehensible. It assumes the implementation of a remedy which has not been determined, and that this hypothetical solution will meet ARARs which have been misrepresented.

Page 4-4, section "Reduction...": refers to "... removing / isolating contaminated sediments..." Proposed alternative S-4 will only isolate the sediments, not remove them.

Page 4-4, section "Short Term Effectiveness": If no specific groundwater solution has been chosen, how can a completion time be determined?

Pages 4-5 and 4-6: Any discussion of effectiveness, implementability, and cost of the so-far undetermined groundwater alternative is premature.

This reviewer is aware that this study focuses on the groundwater and sediment aspects of the Havertown PCP site, but cannot forget that a significant problem still exists in the contaminated soils beneath the NWP property. Any groundwater/sediment remediation proposed must allow for the eventual soils cleanup.

The above comments are many and indicate the Commonwealth's concern with attaining the best possible remediation of the Havertown site. We look foreward to meeting with you and other EPA representatives, and with Tetra Tech. Please call me at 832-6199 when a meeting can be scheduled, or if you have any questions

Sincerely,

David C. Kennedy

David C. Kennedy, Project Officer

cc. G. Danyliw
W. Cole
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HSCA file